

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI**

**IN RE: JAMES T. & RHONDA C. MORRIS
DEBTORS**

**CASE NO: 16-12664
CHAPTER 13**

MOTION FOR MODIFICATION OF PLAN

COME NOW the debtors and file this proposed modification of their Chapter 13 plan as follows:

The debtors filed this Chapter 13 petition on August 04, 2016. They proposed a thirty-six (36) month plan. The debtors respectfully request to extend their plan to a sixty (60) month term. The debtors also respectfully request that their wage order be recalculated. They will use the extra income towards their living expenses.

WHEREFORE, the debtors pray that the Chapter 13 Plan be modified as set forth above.

RESPECTFULLY submitted, this the 23rd day of July, 2019.

/s/William C. Cunningham
William C. Cunningham
Attorney for Debtor

MITCHELL & CUNNINGHAM
William C. Cunningham, 7964
112 N Broadway
P.O. Box 7177
Tupelo, MS 38802
(662) 407-0408 (Office)
(662) 407-0782 (Fax)

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI**

**IN RE: JAMES T. & RHONDA C. MORRIS
DEBTORS**

**CASE NO: 16-1264
CHAPTER 13**

NOTICE OF MOTION

YOU ARE HEREBY NOTIFIED that a written response to the attached Motion for Modification, must be filed with:

Shallanda J. Clay, Clerk of Court
U.S. Bankruptcy Court
Northern District of Mississippi
703 Hwy. 145 North
Aberdeen, MS 39703-0867

and a copy must be served on the undersigned Debtors' attorney and the Chapter 13 Trustee on or before thirty (30) days from the date of this notice, or the Court may consider said motion immediately after the objection or response due date. In the event a written response is filed, the Court will notify you of the date, time and place of the hearing thereon.

DATED: July 23, 2019

CHAPTER 13 STANDING TRUSTEE
LOCKE D. BARKLEY
sbeasley@barkley13.com

/s/William C. Cunningham
Attorney for Debtor
MITCHELL & CUNNINGHAM
112 North Broadway
Post Office Box 7177
Tupelo, MS 38802-7177
(662) 407-0408

**IN THE UNITED STATES BANKRUPTCY COURT
FOR NORTHERN DISTRICT OF MISSISSIPPI**

**IN RE: JAMES T. & RHONDA C. MORRIS
DEBTORS**

**CASE NO: 16-12664
CHAPTER 13**

CERTIFICATE OF SERVICE

I, William C. Cunningham, Attorney for the debtors do hereby certify that I have this day either mailed, a true and correct copy by United States mail, postage prepaid, or electronically mailed through ECF, a copy of the attached Notice and Motion to the following:

Locke D. Barkley
sbeasley@barkley13.com

United States Trustee
USTPRegion05.AB.ECF@usdoj.gov

All Creditors on Matrix

DATED: July 23, 2019

/s/William C. Cunningham
William C. Cunningham
Attorney at Law

MITCHELL & CUNNINGHAM
112 N Broadway
Post Office Box 7177
Tupelo, MS 38802-7177
(662) 407-0408

Label Matrix for local noticing

0537-1

Case 16-12664-JDW

Northern District of Mississippi

Aberdeen

Tue Jul 23 14:14:07 CDT 2019

1st Heritage Credit

125-A Heritage Dr.

Oxford, MS 38655-5458

1st Franklin Financial

2249 Hwy 15 North

Pontotoc, MS 38863-6832

1st Franklin Financial Corporation

PO Box 552

Pontotoc, MS 38863-0552

Advance America

245-A Hwy 15 North

Pontotoc, MS 38863-1314

Locke D. Barkley

6360 I-55 North

Suite 140

Jackson, MS 39211-2038

(p)CAPITAL ONE

PO BOX 30285

SALT LAKE CITY UT 84130-0285

Capital One Bank (USA), N.A.

PO Box 71083

Charlotte, NC 28272-1083

Credit Collection Services

725 Canton Street

Norwood, MA 02062-2679

William C. Cunningham

P.O. Box 7177

Tupelo, MS 38802-7177

FCSI

PO Box 3910

Tupelo, MS 38803-3910

First Heritage Credit of Ms LLC

125-A Heritage Drive

Oxford, MS 38655-5458

First Premier Bank

P.O. Box 5519

Sioux Falls, SD 57117-5519

First Source Advantage

205 Bryant Woods South

Amherst, NY 14228-3609

Geico

One Geico Plaza

Bethesda, MD 20811-0001

Ginny's

1112 7th Ave.

Monroe, WI 53566-1364

Ginny's

c/o Creditors Bankruptcy Service

P.O. Box 800849

Dallas, TX 75380-0849

Linda D. Graham

1068 CR 43

Atlanta, GA 30374

Jacob Law Group PLLC

P.O. Box 948

Oxford, MS 38655-0948

LVNV Funding LLC

c/o Resurgent Capital Services

PO Box 10587

Greenville, SC 29603-0587

LVNV Funding, LLC its successors and assigns

assignee of Bluestem Brands, Inc.

Resurgent Capital Services

PO Box 10587

Greenville, SC 29603-0587

Law Firm of Ryan E. Calef

The Bucks County Office Center

1276 Veterans Hwy, Suite E-1

Bristol, PA 19007-2597

Linda Graham

1068 CR 43

Atlanta, GA 30374

Robert H. Lomenick Jr.

P.O. Box 417

Holly Springs, MS 38635-0417

Mid America Bank and Trust,

Continental Finance

P.O. Box 8099

Newark, DE 19714-8099

Midland Funding

2365 NorthSide Drive Ste 300

San Diego, CA 92108-2709

Midland Funding LLC

PO Box 2011

Warren, MI 48090-2011

Mirand Response Systems

P.O. Box 219050

Houston, TX 77218-9050

Montgomery Ward
1112 7th Ave
Monroe, WI 53566-1364

Montgomery Ward
c/o Creditors Bankruptcy Service
P.O. Box 800849
Dallas, TX 75380-0849

James T. Morris Jr.
212 W. Sweet Potato Ave
Vardaman, MS 38878-9428

Rhonda C. Morris
212 W. Sweet Potato Ave
Vardaman, MS 38878-9428

Navient
P.O. Box 9635
Wilkes Barre, PA 18773-9635

Navient Solutions Inc.
Department of Education Loan Services
P.O. Box 9635
Wilkes-Barre, PA 18773-9635

Nelnet
P.O. Box 740283
Atlanta, GA 30374-0283

North MS Medical Center
830 S. Gloster
Tupelo, MS 38801-4996

Northland Group Inc.
P.O. Box 390846
Minneapolis, MN 55439-0846

(p) OXFORD UNIVERSITY BANK
1500 UNIVERSITY AVE
OXFORD MS 38655-4034

Pathgroup Labs
5301 Virginia Way
Brentwood, TN 37027-7541

Penn Credit
P.O. Box 988
Harrisburg, PA 17108-0988

Pontotoc Check Delay
291 A W. Oxford St.
Pontotoc, MS 38863-1919

Pontotoc County Justice Court
29 East Washington Street
Pontotoc, MS 38863-2923

(p) PORTFOLIO RECOVERY ASSOCIATES LLC
PO BOX 41067
NORFOLK VA 23541-1067

Premier Bankcard, Llc
c/o Jefferson Capital Systems LLC
Po Box 7999
Saint Cloud Mn 56302-7999

Quantum3 Group LLC as agent for
Sadino Funding LLC
PO Box 788
Kirkland, WA 98083-0788

Ray Stark
104 W. Oxford St.
Pontotoc, MS 38863-2015

Recovery Management Systems Corporation
25 SE 2nd Ave, Suite 1120
Miami, FL 33131-1605

(p) REPUBLIC FINANCE LLC
282 TOWER RD
PONCHATOULA LA 70454-8318

Seventh Avenue
c/o Creditors Bankruptcy Service
P.O. Box 800849
Dallas, TX 75380-0849

Synchrony Bank
c/o Recovery Management Systems Corporat
25 S.E. 2nd Avenue, Suite 1120
Miami, FL 33131-1605

Synchrony Bank/ Walmart
P.O. Box 965024
Orlando, FL 32896-5024

Tupelo Service Finance
P.O. Box 1791
Tupelo, MS 38802-1791

U. S. Attorney for Navient
Northern District of Mississippi
900 Jefferson Avenue
Oxford MS 38655-3608

U. S. Trustee
501 East Court Street, Suite 6-430
Jackson, MS 39201-5022

U.S. Department of Education C/O Nelnet
121 South 13th St, Suite 201
Lincoln, NE 68508-1911

Van Ru Credit Corporation
1350 E Touhy Ave Ste. 300 E
Des Plaines, IL 60018-3303

Web Bank/Fingerhut
6250 Ridgewood Road
Saint Cloud, MN 56303-0820

Woodforest Bank
100 McCord Road
Pontotoc, MS 38863-6245

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

Capital One Bank
15000 Capital One Drive
Glen Allen, VA 23238

Oxford University Bank
1550 University Ave.
Oxford, MS 38655

(d) Oxford University Bank
1500 University Ave
Oxford, MS 38655

Portfolio Recovery Associates, LLC
P.O. Box 12914
Norfolk, VA 23541-1223

(d) Portfolio Recovery Associates, LLC
POB 41067
Norfolk VA 23541

Republic Finance
P.O. Box 861
New Albany, MS 38652

(d) Republic Finance
P.O. Box 861
New Albany, MS 38652

(d) Republic Finance, LLC
1140 Roma Avenue
Hammond, LA 70403

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(d) 1st Franklin Financial
2249 Hwy 15 North
Pontotoc, MS 38863-6832

End of Label Matrix	
Mailable recipients	59
Bypassed recipients	1
Total	60